Confidential and Proprietary Business Information
Not for Public Disclosure

August 31, 2020

VIA ELECTRONIC AND FIRST CLASS MAIL

(Brancho.jennie@epa.gov)

Ms. Jennie Brancho
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency
Region III
1650 Arch Street (3ED32)
Philadelphia, PA 19103-2029

Re: *CWA Section 308 Information Requirement*
Issued to Horizon Land Management, LLC

Dear Ms. Brancho:

This letter and exhibits respond to the U.S. Environmental Protection Agency's ("EPA") July 1, 2020 Information Requirement ("IR") pursuant to Section 308 of the Clean Water Act that was issued to Horizon Land Management, LLC ("Horizon"). The IR requested a partial response within thirty (30) days. By letter dated July 30, 2020, through our outside environmental counsel, we requested an extension of time until August 31, 2020 to submit a complete response to the IR. EPA approved the requested extension by e-mail on July 30, 2020. We appreciate the agency's courtesy in that regard.

The RFI seeks information and documents concerning wastewater treatment plants ("WWTPs") serving three (3) manufactured home communities: Boones Estates MHC, LLC, Maryland Manor MHC, LLC and Patuxent MHC, LLC. Ex. 4 CBI

Ex. 4 CBI

Ex. 4 CBI Accordingly, this Response is submitted by the three (3) limited liability companies with the required certification being made by the managing member for each company.[1]

For each WWTP, some of the IR questions seek information relating to activities covering the time period from June 1, 2015 through March 31, 2020. We did not own or operate any of the three (3) communities or the associated WWTPs as of June 1, 2015. As a result, we have not identified information relating to the questions in the IR prior to the date of acquisition of each community (Boones Estates – January 2017; Maryland Manor

[1] Please note that information in this paragraph regarding Ex. 4 CBI is considered confidential and proprietary business information that should not be disclosed pursuant to the Freedom of Information Act, and is the reason this letter is designated as such.

– March 2016; Patuxent – September 2017). Nevertheless, we have responded to the IR on the basis of the best information currently known to be available. Subsequent investigation may reveal additional information that is responsive to the IR, and for that reason, we reserve the right to supplement or amend this Response.

Finally, while we desire to cooperate with EPA in this matter, we must state that nothing in this Response should be construed as an admission of liability, and we reserve all rights to contest any alleged violations or liability in the future. Moreover, nothing provided in response to the IR should be construed as a waiver of any applicable legal privilege, either with respect to information and/or documents being provided, or with respect to information and/or documents that may be requested or provided in the future.

For convenience, the numbered questions contained in the IR are reproduced in bold text, followed by our responses. Exhibits are numbered to correspond with the question of the IR to which they relate. All Exhibits are being provided electronically.

We anticipate that EPA will find the Response to be responsive to the IR. We remain available to discuss with EPA the information contained in this Response.

As required, with respect to the entirety of this Response, we provide the following certification:

> I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Thank you for your time and consideration. Please call Kate Costello, Executive Vice President of Operations, at 443-467-2646, if you have questions.

Sincerely,

Drew Odabashian
Managing Member

BOONES ESTATES MHC, LLC
MARYLAND MANOR MHC, LLC
PATUXENT MHC, LLC

cc: Kate Costello
Rikki Drykerman, Esq.
Emmett Conneely
Robert Tyson, Esq.

EPA INFORMATION REQUEST RESPONSES

Background

Information in this Background section is provided because it is generally applicable to each of the WWTPs addressed in the IR questions that follow. Providing this information will obviate the need to repeat it in connection with responses to the individual questions.

From the date of acquisition of each community (Boones Estates – January 2017; Maryland Manor – March 2016; and Patuxent – September 2017) until July 15, 2019, each WWTP was operated by a contract wastewater treatment operator, Water Services, Inc. ("WSI"). WSI operated each WWTP for the prior owners of each community, and continued in that role after each facility was acquired. The principal of WSI, Edward Crooks, was responsible for the operation of each WWTP, including arranging for sampling in accordance with the permit for each facility and completion and submission of discharge monitoring reports ("DMRs") to the MDE.

Effective July 16, 2019, the contract operator for each WWTP changed from WSI to Professional Startup & Operational Services, Inc. ("Prostart"). From that date forward, Prostart was responsible to operate the WWTPs and to perform required sampling and compliance reporting. Performance concerns led to the termination of Prostart effective March 31, 2020. These concerns included insufficient communication regarding WWTP operations, and in some instances, either late or no reporting of DMR results to the MDE via NetDMR. Many of the reporting deficiencies were brought to our attention by a representative of MDE who performed inspections of the Boones Estates WWTP in 2019 and 2020. In addition, Prostart routinely failed to provide copies of submitted DMRs and other reports. Effective April 1, 2020, Singh Operational Services, Inc. ("SOS") began operating the WWTPs. After assuming responsibility for WWTP operation, SOS prepared and submitted past DMRs to the NetDMR system to ensure all information was up-to-date.[2]

Since August 2019, we have been engaged in discussions concerning the potential transfer of the WWTPs to Anne Arundel County. James Howard, P.E. of the County Public Works Department has been our primary contact for these discussions. The County has is considering the conversion of multiple private sewer systems to a public sewer system. We met with representatives of the County's Public Works Department in September 2019 to preliminarily discuss transfer and conversion of our WWTPs. County representatives have since visited the WWTPs. It is our understanding that under the County's preferred approach, the Boones Estates, Maryland Manor and Patuxent

[2] For Boones Estates and Maryland Manor, SOS submitted DMRs to NetDMR covering Prostart's period of operation in August 2019 and September 2019. For Patuxent, SOS submitted DMRs to NetDMR covering Prostart's period of operation from August 2019 through March 2020. Representatives of the MDE were very helpful in identifying what needed to be submitted and in facilitating SOS access to NetDMR.

WWTPs would be used as lift stations, and another private sewer system (Waysons Woods) would be used as the WWTP. We further understand that County representatives have provided information regarding proposed conversion alternatives to the MDE, and that a meeting will soon be scheduled with MDE representatives to discuss the alternatives. We expect to receive proposed transfer documentation in the coming weeks from the County.

The remainder of this Response provides answers to the individual questions of the IR. All answers have been prepared collectively by the following:

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Responses were prepared in consultation with outside environmental counsel, Robert Tyson, at Bond, Schoeneck & King, PLLC, in Syracuse, New York (rtyson@bsk.com – 315.218.8221)

Facility: Boones Mobile Estate Wastewater Treatment Plant

15. Provide a narrative description of Boones Mobile Estate Wastewater Treatment Plant, located at 1091 Marlboro Road, Lothian, Maryland 20711 ("Boones WWTP"); operational processes; and water pollution control equipment. Include in your response a site map that includes all outfall locations.

Response: The flow enters the aeration tank after being screened and then flows into the transfer port located inside the clarifier. The flow settles in the clarifier, and the solids which settle to the bottom are pumped back to the aeration tank. The clear water overflows through the weir into the treatment building through a rotary filter system. After that, the water flows to the effluent chamber where it is aerated, then flows through the UV system (provides the disinfection process) and is ultimately discharged through the outfall pipe to Galloway Creek. The sludge from

the bottom of clarifier is returned most of the day back to aeration tank. Once each day sludge is wasted to sludge holding tank which is then hauled away for further processing of the sludge as approved by MDE. A site map showing the outfall location is attached as Exhibit 15.

16. **Attached is a spreadsheet with effluent exceedances identified in EPA's data systems for the period June 1, 2015 through March 31, 2020 and based on discharge monitoring reports (DMR) submitted by Boones WWTP (Attachment 1). Please identify any additional effluent exceedances for the period of June 1, 2015 through March 31, 2020 not identified on the spreadsheet and provide a certification as to the accuracy of the spreadsheet and any additions pursuant to Paragraph 12.**

Response: As stated in the Background section above, the Boones Estates WWTP was acquired in January 2017. Consequently, we do not have independent knowledge of effluent exceedances, to the extent any occurred, prior to that date.

Copies of DMRs covering the period of time from January 2017 through March 31, 2020 have been reviewed to determine whether any effluent exceedances, in addition to those EPA identified on Attachment 1, were reported.[3] Based on this review, we determined that exceedances of several biochemical oxygen demand ("BOD") limits and total suspended solids ("TSS") limits were reported in August 2019. An updated version of Attachment 1 reflecting these additional exceedances is attached to this Response.

No other effluent exceedances were identified during the relevant time period.

17. **For each exceedance identified in Paragraph 16, provide a detailed narrative description of the cause of the exceedance and any measure you have taken or intend to take to correct the exceedance or prevent future exceedances. Include completed or scheduled dates for each identified measure. If applicable, include detailed noncompliance notifications submitted to Maryland Department of the Environment ("MDE").**

Response: The Boones Estates WWTP has been contracted to a third-party operator for the entire period of our ownership. For that reason, available information regarding causes of individual exceedances is limited to information contained in Notices of Noncompliance the operators provided to the MDE. A summary of the information in available Notices is provided below.

[3] Some of the DMR unit values specified on the version of Attachment 1 that accompanied the IR are set forth in kilograms/day, however, our permit establishes mass-based limits in units of pounds/day and not kilograms/day.

October 2019 – TSS and BOD exceedances related to blower control problems; addressed by performing corrective maintenance to blower control system.

November 2019 – TSS exceedances related to higher than normal clarifier sludge blanket level ("SBL") and effluent rotary drum filter out of service; addressed by increasing sludge wasting and ordering parts for effluent rotary drum repair.

February 2020 – TSS exceedances related to inability to meet solids wasting demand due to volume limitation at discharge site; addressed by establishing permit to allow authorized hauling of solids and proposed installation of 10K gallon sludge-holding tank for wasting and thickening (installation was completed); BOD exceedance because insufficient aeration capacity to maintain BOD removal; addressed by taking actions to reduce sludge volume index.

Copies of available Notices of Noncompliance which describe the cause of exceedances and corrective action are attached as Exhibit 17.

18. Provide copies of any documents identified in or in support of your responses to questions 15-17, including copies of DMRs for violations identified in Paragraph 16.

Response: Copies of DMRs obtained from NetDMR, as well as copies of any individual DMRs in our files are attached at Exhibit 18. Associated analytical reports and daily and/or monthly operating reports are also included with the DMRs.

19. Provide any additional information related to violations that impact the current compliance status at the Boones WWTP, other than those exceedances identified in Paragraph 16.

Response: Since taking over responsibility for WWTP operations in April of this year, SOS has been working to implement operational improvements at the facility. Additional exceedances (TSS, nitrogen ammonia total) and pH (April only)) occurred in the April through July time period. MDE inspected the WWTP in January, June and July 2020, and requests for corrective action were made. SOS has been in frequent communication with MDE regarding the requested corrective action, some of which remains underway (e.g., preparation of capacity management plan) and some of which has been completed. Communication with MDE will continue, and we anticipate that SOS implementation of continued corrective actions will result in enhanced WWTP performance.

Facility: Maryland Manor Mobile Home Park Wastewater Treatment Plant

20. Provide a narrative description of Maryland Manor Mobile Home Park Wastewater Treatment Plant, located at 4642 Sands Road, Harwood, Maryland 20776 ("Maryland Manor WWTP"); operational processes;

and water pollution control equipment. Include in your response a site map that includes all outfall locations.

Response: The flow of wastewater enters the plant through the influent pump station. From the influent pump station, wastewater is conveyed to the bar screen located on top of the aeration tank. The flow enters the aeration tank after being screened and then flows into the transfer port located inside the clarifier. The flow settles in the clarifier, and the solids which settle to the bottom are pumped back to the aeration tank. The clear water overflows through the weir into the UV system (provides the disinfection process). After the UV process, the water flows to the effluent chamber where it is aerated before being discharged through the outfall pipe to the Patuxent River. The sludge from the bottom of clarifier is returned most of the day back to aeration tank. Once each day sludge is wasted to sludge holding tank which is then hauled away for further processing of the sludge as approved by MDE. A site map showing the outfall location is attached as Exhibit 20.

21. **Attached is a spreadsheet with effluent exceedances identified in EPA's data systems for the period June 1, 2015 through March 31, 2020 and based on discharge monitoring reports (DMR) submitted by Maryland Manor WWTP (Attachment 2). Please identify any additional effluent exceedances for the period of June 1, 2015 through March 31, 2020 not identified on the spreadsheet and provide a certification as to the accuracy of the spreadsheet and any additions pursuant to Paragraph 12.**

Response: As stated in the Background section above, the Maryland Manor WWTP was acquired in March 2016. Consequently, we do not have independent knowledge of effluent exceedances, to the extent any occurred, prior to that date.

Copies of DMRs covering the period of time from March 2016 through March 31, 2020 have been reviewed to determine whether any effluent exceedances, in addition to those EPA identified on Attachment 2, were reported.[4] Based on this review, we determined that exceedances of the applicable dissolved oxygen limit were reported in August 2019 and September 2019. An updated version of Attachment 2 reflecting these additional exceedances is attached to this Response.

In addition, during July 2019, Prostart was retained to operate the Maryland Manor WWTP. Due to an absence of records from WSI, Prostart indicated that it was unable to verify the maximum daily flow through the WWTP for July. This information was reported on the DMR for July 2019. Although not an exceedance, this information was included on the DMR due to the transition in WWTP operator. During August 2019, October 2019 and November 2019, Prostart operators did

[4] Some of the DMR unit values specified on the version of Attachment 2 that accompanied the IR are set forth in kilograms/day, however, our permit establishes mass-based limits in units of pounds/day and not kilograms/day.

not sample for orthophosphate (as Phosphorus). The permit requires collection of a monthly sample, but does not specify an effluent limit. Notices of Noncompliance were submitted to the MDE in November 2019, December 2019, January 2020, March 2020.

No other effluent exceedances were identified during the relevant time period.

22. **For each exceedance identified in Paragraph 21, provide a detailed narrative description of the cause of the exceedance and any measure you have taken or intend to take to correct the exceedance or prevent future exceedances. Include completed or scheduled dates for each identified measure. If applicable, include detailed noncompliance notifications submitted to MDE.**

Response: The Maryland Manor WWTP has been contracted to a third-party operator for the entire period of our ownership. For that reason, available information regarding causes of individual exceedances is limited to information contained in Notices of Noncompliance the operators provided to the MDE. A summary of the information in available Notices is provided below.

October 2019 – pH and TSS exceedances, the latter due to a blower malfunction which caused the clarifier air lift to stop returning settled solids to aeration. In addition, orthophosphate was not sampled; issues addressed by installation of automated chemical feed system to maintain alkalinity, notification of Prostart operations staff of organophosphate sampling requirement, and restoration of blower operation and solids removal.

November 2019 – orthophosphate was not sampled; again, Prostart notified its operations staff of the organophosphate sampling requirement.

December 2019 – TSS exceedance due to high level of solids in clarifier because of inability to waste solids due to non-established sewage sludge utilization ("SSU") permit; addressed by establishing proper SSU permit and removing solids from system.

February 2020 - TSS exceedance related to inability to meet solids wasting demand due to volume limitation at discharge site; addressed by establishing permit to allow authorized hauling of solids and installation of 10K gallon sludge-holding tank for wasting and thickening.

Copies of available Notices of Noncompliance which describe the cause of exceedances and corrective action are attached as Exhibit 22.

23. **Provide copies of any documents identified in or in support of your responses to questions 20-22, including copies of DMRs for exceedances identified in Paragraph 21.**

Response: Copies of DMRs obtained from NetDMR, as well as copies of any individual DMRs in our files are attached at Exhibit 23. Associated analytical reports and Monthly Operating Reports are also included with the DMRs.

24. Provide any additional information related to violations that impact the current compliance status at the Maryland Manor WWTP, other than those exceedances identified in Paragraph 21.

Response: Since taking over responsibility for WWTP operations in April of this year, SOS has been working to implement operational improvements at the facility. Additional exceedances (TSS, BOD, e-Coli and pH) occurred in the April through June time period. However, there were no exceedances of permit limits in July and SOS will continue to make progress regarding operational enhancements in the coming months.

Facility: Patuxent Mobile Estates Wastewater Treatment Plant

25. Provide a narrative description of Patuxent Mobile Estate Wastewater Treatment Plant, located at 5380 Sands Road, Lothian, Maryland 20711 ("Patuxent WWTP"); operational processes; and water pollution control equipment. Include in your response a site map that includes all outfall locations.

Response: The influent flow enters the wastewater plant through the bar screen through to the aeration tank. From the aeration tank wastewater enters a primary clarifier which then allows flow into the secondary clarifier. Once in the second clarifier, the water and sludge are separated. The water settles and the sludge from both clarifiers is returned to the aeration tank. The clear water from the secondary clarifier flows through the weir on top and into an effluent holding tank. From the holding tank, the water flows via gravity through the UV system (provides the disinfection process) and through the outfall pipe to the Patuxent River. The sludge from the clarifiers is returned mostly to the aeration tank. This is periodically wasted to the sludge tank to be hauled away for further processing of the sludge as approved by MDE. A site map showing the outfall location is attached as Exhibit 25.

26. Attached is a spreadsheet with effluent exceedances identified in EPA's data systems for the period June 1, 2015 through March 31, 2020 and based on discharge monitoring reports (DMR) submitted by Patuxent WWTP (Attachment 3). Please identify any additional effluent exceedances for the period of June 1, 2015 through March 31, 2020 not identified on the spreadsheet and provide a certification as to the accuracy of the spreadsheet and any additions pursuant to Paragraph 12.

Response: As stated in the Background section above, the Patuxent WWTP was acquired in September 2017. Consequently, we do not have independent knowledge of effluent exceedances, to the extent any occurred, prior to that date.

Copies of DMRs covering the period of time from September 2017 through March 31, 2020 were reviewed to determine whether any effluent exceedances, in addition to those EPA identified on Attachment 3, were reported.[5] Based on this review, no additional effluent exceedances were identified.

Patuxent MHC's discharge permit was renewed effective June 1, 2019, and additional sampling parameters were included in the renewed permit. During June 2019, when the WWTP was operated by WSI, a sample was not obtained for orthophosphate (as Phosphorus) which was a new monitor-only parameter in the permit. WSI's principal wrote to MDE and indicated he was not aware of the renewed permit, and therefore, did not sample for orthophosphate. In addition, Prostart also failed to collect a sample for orthophosphate in October 2019.

27. **For each exceedance identified in Paragraph 26, provide a detailed narrative description of the cause of the exceedance and any measure you have taken or intend to take to correct the exceedance or prevent future exceedances. Include completed or scheduled dates for each identified measure. If applicable, include detailed noncompliance notifications submitted to MDE.**

Response: Each of the exceedances identified on Attachment 3 occurred during the time period when Prostart was the WWTP operator. Due to a lack of communication by Prostart, we are not aware of the reason for the exceedances listed on Attachment 3. We have not identified Notices of Noncompliance pertaining to these exceedances.

28. **Provide copies of any documents identified in or in support of your responses to questions 25-27, including copies of DMRs for exceedances identified in Paragraph 26.**

Response: Copies of DMRs obtained from NetDMR, as well as copies of any individual DMRs in our files are attached at Exhibit 28. Associated analytical reports are also included with the DMRs.

29. **Provide any additional information related to violations that impact the current compliance status at the Patuxent WWTP, other than those exceedances identified in Paragraph 26.**

[5] Some of the DMR unit values specified on the version of Attachment 3 that accompanied the IR are set forth in kilograms/day, however, our permit establishes mass-based limits in units of pounds/day and not kilograms/day.

Response: As reflected on Attachment 3, the Patuxent WWTP has experienced the fewest exceedances since it was acquired in September 2017. That has continued since SOS assumed responsibility for WWTP operations in April. While there were exceedances in April (TSS, BOD, e-Coli and pH) and May (e-Coli only), there were no exceedances in June or July sampling. Consequently, we are optimistic that SOS's operational capabilities will help assure permit compliance in the future.

ATTACHMENT 1
Effluent Limit Exceedances Report

MD0050903: BOONES MOBILE ESTATE WWTP, LOTHIAN, MD 20711-2404

Monitoring Period Date Range: 06/01/2015 to 03/31/2020

Monitoring Period Date	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Unit
1/31/2019	1	Solids, total suspended	MX WK AV	3.718820862	kg/d	3.628117914	kg/d
6/30/2019	1	Solids, total suspended	MX WK AV	3.718820862	kg/d	3.628117914	kg/d
7/31/2019	1	Solids, total suspended	MX MO AV	35.5	mg/L	8	mg/L
7/31/2019	1	Solids, total suspended	MX WK AV	69	mg/L	12	mg/L
7/31/2019	1	Solids, total suspended	MX MO AV	7.986394558	kg/d	2.403628118	kg/d
7/31/2019	1	Solids, total suspended	MX WK AV	15.65986395	kg/d	3.628117914	kg/d
8/31/2019	1	BOD, 5-day, 20 deg. C	MX MO AV	9.77	lb/d	5.3	lb/d
8/31/2019	1	BOD, 5-day, 20 deg. C	MX WK AV	18.95	lb/d	8.0	lb/d
8/31/2019	1	BOD, 5-day, 20 deg. C	MX MO AV	16.5	mg/L	8.0	mg/L
8/31/2019	1	BOD, 5-day, 20 deg. C	MX WK AV	32.0	mg/L	12.0	mg/L
8/31/2019	1	Solids, total suspended	MX MO AV	11.4	lb/d	5.3	lb/d
8/31/2019	1	Solids, total suspended	MX WK AV	37.9	lb/d	8.0	lb/d
8/31/2019	1	Solids, total suspended	MX MO AV	19.25	mg/L	8.0	mg/L
8/31/2019	1	Solids, total suspended	MX WK AV	64.0	mg/L	12.0	mg/L
10/31/2019	1	BOD, 5-day, 20 deg. C	MX WK AV	14.2	mg/L	12	mg/L
10/31/2019	1	Solids, total suspended	MX WK AV	44.98866213	kg/d	3.628117914	kg/d
10/31/2019	1	Solids, total suspended	MX MO AV	41	mg/L	8	mg/L
10/31/2019	1	Solids, total suspended	MX MO AV	9.46031746	kg/d	2.403628118	kg/d
10/31/2019	1	Solids, total suspended	MX WK AV	195	mg/L	12	mg/L
11/30/2019	1	Solids, total suspended	MX WK AV	27	mg/L	12	mg/L

11/30/2019	1	Solids, total suspended	MX WK AV	5.718820862	kg/d	3.628117914	kg/d
11/30/2019	1	Solids, total suspended	MX MO AV	21	mg/L	8	mg/L
11/30/2019	1	Solids, total suspended	MX MO AV	4.448979592	kg/d	2.403628118	kg/d
12/31/2019	1	Solids, total suspended	MX MO AV	10.9	mg/L	8	mg/L
12/31/2019	1	Solids, total suspended	MX WK AV	14.7	mg/L	12	mg/L
2/29/2020	1	BOD, 5-day, 20 deg. C	MX WK AV	14.5	mg/L	12	mg/L
2/29/2020	1	Solids, total suspended	MX WK AV	54	mg/L	12	mg/L
2/29/2020	1	Solids, total suspended	MX MO AV	3.954648526	kg/d	2.403628118	kg/d
2/29/2020	1	Solids, total suspended	MX WK AV	11.46485261	kg/d	3.628117914	kg/d
2/29/2020	1	Solids, total suspended	MX MO AV	18.6	mg/L	8	mg/L
3/31/2020	1	Solids, total suspended	MX WK AV	13	mg/L	12	mg/L

ATTACHMENT 2
Effluent Limit Exceedances Report

MD0024333: MARYLAND MANOR WWTP, HARWOOD, MD 20776
Monitoring Period Date Range: 06/01/2015 to 03/31/2020

Monitoring Period Date	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Unit
8/31/2019	1	Oxygen, dissolved [DO]	INST MIN	3.6	mg/L	5.0	mg/L
9/30/2019	1	Oxygen, dissolved [DO]	INST MIN	3.1	mg/L	5.0	mg/L
10/31/2019	1	pH	MINIMUM	6.3	SU	6.5	SU
10/31/2019	1	Solids, total suspended	MX WK AV	61	mg/L	45	mg/L
12/31/2019	1	Solids, total suspended	MX WK AV	307	mg/L	45	mg/L
12/31/2019	1	Solids, total suspended	MX MO AV	15.78684807	kg/d	10.430839	kg/d
12/31/2019	1	Solids, total suspended	MX WK AV	52.25396825	kg/d	15.41950113	kg/d
12/31/2019	1	Solids, total suspended	MX MO AV	92.75	mg/L	30	mg/L
2/29/2020	1	Solids, total suspended	MX MO AV	36.5	mg/L	30	mg/L
2/29/2020	1	Solids, total suspended	MX WK AV	20.81632653	kg/d	15.41950113	kg/d
2/29/2020	1	Solids, total suspended	MX MO AV	18.09070295	kg/d	10.430839	kg/d
3/31/2020	1	Solids, total suspended	MX MO AV	41.75	mg/L	30	mg/L
3/31/2020	1	Solids, total suspended	MX MO AV	21.89115646	kg/d	10.430839	kg/d
3/31/2020	1	Solids, total suspended	MX WK AV	72	mg/L	45	mg/L
3/31/2020	1	Solids, total suspended	MX WK AV	37.75510204	kg/d	15.41950113	kg/d

ATTACHMENT 3
Effluent Limit Exceedances Report

MD0024694: PATUXENT MHC, LLC, LOTHIAN, MD 20711
Monitoring Period Date Range: 06/01/2015 to 03/31/2020

Monitoring Period Date	Outfall	Parameter Description	Limit Type	DMR Value	Value Unit	Limit Value	Limit Value Unit
10/31/2019	1	Oxygen, dissolved (DO)	MINIMUM	3.8	mg/L	5	mg/L
11/30/2019	1	Oxygen, dissolved (DO)	MO AV MN	5.2	mg/L	5.5	mg/L
11/30/2019	1	Oxygen, dissolved (DO)	MINIMUM	3.1	mg/L	5	mg/L
11/30/2019	1	pH	MINIMUM	6.3	SU	6.5	SU
12/31/2019	1	Oxygen, dissolved (DO)	MINIMUM	3.7	mg/L	5	mg/L
2/29/2020	1	E. coli	MO GEOMX	200.5	MPN/100mL	126	MPN/100mL
3/31/2020	1	BOD, 5-day, 20 deg. C	MX WK AV	49.4	mg/L	45	mg/L
3/31/2020	1	E. coli	MO GEOMX	200.5	MPN/100mL	126	MPN/100mL

Exhibit 15: Boones Estates Site Map
Exhibit 17: Boones Estates Notices of Noncompliance
Exhibit 18: Boones Estates DMRs and associated data/reports
Exhibit 20: Maryland Manor Site Map
Exhibit 22: Maryland Manor Notices of Noncompliance
Exhibit 23: Maryland Manor DMRs and associated data/reports
Exhibit 25: Patuxent Site Map
Exhibit 28: Patuxent DMRs and associated data/reports